



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

DEVAL L. PATRICK
Governor

MAEVE VALLELY BARTLETT
Secretary

DAVID W. CASH
Commissioner

July 8, 2014

Mr. Fred Paris
Kanzaki Specialty Papers
20 Cummings Street
Ware, MA 01082

RE: Ware
Transmittal No.: X257606
Application No.: WE-13-030
Class: *SM80-7*
FMF No.: 131241
AIR QUALITY PLAN APPROVAL

Dear Mr. Paris:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your Limited Plan Application ("Application") listed above. This Application concerns the proposed alteration of the existing Ishikawajima-Harima Heavy Industries, Model #1031-334 paper surface coater (known as Coater #20) at your paper surface coating facility located at 20 Cummings Street in Ware, Massachusetts ("Facility").

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control," regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

This Plan Approval supersedes the conditions for the Ishikawajima-Harima Heavy Industries, Model #1031-334 paper surface coater (known as Coater #20) contained in Non-

Major Comprehensive Plan Approval # 1-P-10-001 dated March 24, 2010. However, the facility-wide VOC and HAP emission limits as well as the combined NOx emission limits and fuel usage restrictions for Boiler #1, Boiler #2, Boiler #3, Coater #11, Coater #20 and Coater #21 contained in Non-Major Comprehensive Plan Approval # 1-P-10-001 remain unchanged.

1. DESCRIPTION OF FACILITY AND APPLICATION

Kanzaki Specialty Papers manufactures coated papers for use as point of sale receipts, automatic teller machine receipts, gaming products, transportation tickets, entertainment tickets, as well as commercial applications including lumber tags, fax paper and medical wrist bands. The current process at the facility includes raw material storage, coating mixing and application, paper drying, converting, packaging, material reclamation, finished product storage, shipping and receiving.

The facility currently has three paper surface coaters (known as Coater, #11, Coater #20 and Coater #21) which are operating pursuant to Non-Major Comprehensive Plan Approval (NMCPA) #1-P-10-011 issued March 24, 2010. The facility plans to make a physical modification to Coater #20, a Ishikawajima-Harima Heavy Industries, Model #1031-334 paper surface coater constructed at the facility in 1989, by increasing the line speed above the current limitation of 2650 feet per minute. A plan approval application was required to modify the existing line speed restriction. However, the modification of the line speed will not result in any increases to Coater #20's current emission limits or require any changes to the facility-wide emission limits contained in NMCPA #1-P-10-011.

NMCPA #1-P-10-011 contains facility-wide emission limits of 49.0 tons per year of volatile organic compounds (VOCs), 9.8 tons per year of individual hazardous air pollutants (HAPs) and 24.0 tons per year of total HAPs as well as a combined nitrogen oxides (NOx) emission limit of 34.36 tons per year for Boiler #1, Boiler #2, Boiler #3, Coater #11, Coater #20 and Coater #21. According to NMCPA #1-P-10-011, Coater #20 has a combined propane and #2 fuel oil usage limitation with Boiler #1, Boiler #2, Boiler #3, Coater #11 and Coater #21. The #2 fuel oil and propane combined fuel usage is not to exceed 800,000 gallons per month based on a 30-day rolling total and 4,900,000 gallons per 12 consecutive month period. These emission and fuel usage restrictions remain unchanged by this plan approval.

The paper surface coating process for Coater #20 begins by preparing coatings in the mix room and then conveying them to the coater through stainless steel piping or tote containers. The coater's color delivery system meters the prescribed coating weight to the coater head. Coater #20 utilizes coating technologies such as smooth rod, blade, mayer rod and air knife to apply the coating to the web which is paper. The wet paper is then sent through dryers which have 15 dryer sections with 14 propane-fired burners that have a combined heat input rate of 23 million Btu per hour. 13 of the burners have an individual maximum heat input rate of 1.5 million Btu per hour and 1 burner has a maximum heat input rate of 3.5 million Btu per hour. Once the coated paper is dried to the correct moisture content, it is rewound and sent to a slitter machine where the roll is converted to the final width prior to packaging for shipment. Coater #20

currently uses only water as a cleaning material. No VOCs or HAP-containing materials are used for cleaning.

According to the facility, the coating with the highest VOC content to be used on Coater #20 will be FTL-B8 which contains 0.052 pounds of VOC per gallon of coating as applied (0.580% by weight). The highest VOC content coating per gallon of solids as applied will be OC-R4 which contains 0.6732 pounds per gallon of solids as applied. The highest HAP content coating will be coating OC-R5 which contains 0.0343 pounds per gallon of coating as applied (0.294% by weight).

The facility used an average coating weight of 8.09 pounds per ream with an average VOC content of 0.176 % by weight, a maximum machine speed of 517.14 reams per hour and 8760 hours per year of operation to calculate that Coater #20 will emit no more than 32.2 tons of VOCs in any 12 consecutive month period.

In addition, the facility used an average coating weight of a 8.63 pounds per ream with an average HAP content of 0.050 % by weight, a maximum machine speed of 517.14 reams per hour and 8760 hours per year of operation to calculate that Coater #20 will emit no more than 9.83 tons of total HAPs in any 12 consecutive month period. The facility requested an individual HAP emission limit of 9.8 tons per year which will be equivalent to the individual HAP facility-wide emission limitation.

Regulatory Applicability

Coater #20 is subject to the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2. which shall be no less stringent than the applicable reasonably available control technology (RACT) standards contained in 310 CMR 7.18(14) for paper surface coating. In lieu of an emission-unit-specific top-down BACT analysis, an applicant may propose an emission control limitation by using one or more of the approaches contained in 310 CMR 7.02(8)(a)2.a. though c. 310 CMR 7.02(8)(a)2.b. allows for the proposal of an emission control limitation using a combination of best management practices, pollution prevention and a limitation on the hours of operation and /or raw material usage which is only available if the proposed allowable emissions are less than 18 tons of VOCs per 12 consecutive month period, less than 18 tons of total organic material HAP and less than ten tons of a single organic material HAP.

To comply with BACT, the facility has proposed the following limitations for Coater #20.

- The maximum VOC and HAP content of coatings will be no more than 0.580% by weight and 0.294% by weight.
- The VOC emissions will not exceed 32.2 tons in any 12 consecutive month period and 2.68 tons per month.
- The total HAP emissions will not exceed 9.83 tons in any 12 consecutive month period and 0.82 tons per month.
- The individual HAP emissions will not exceed 9.8 tons in any 12 consecutive month period and 0.82 tons per month.

- The combined material usage of the highest VOC and HAP content coatings (FTL-B8 and OC-R5) will not exceed 5,000,000 pounds in any 12 consecutive month period.
- Daily records will be kept of the coatings being applied to Coater #20.
- Only water will be used as a cleanup material.
- Work practices will be implemented which minimize the evaporation of VOCs and HAPs.

In addition, the VOC content per gallon of solids as applied will be limited to 1.35 which allows sufficient flexibility since the highest VOC content coating currently in use contains 0.6732 pounds per gallon of solids as applied.

The BACT emission limitation requirements have been established in Table 2 of this plan approval.

The 3.5 million Btu per hour propane-fired burner used in Coater #20's dryer is subject to 310 CMR 7.04(4)(a) which requires the burner to be inspected and maintained in accordance with the manufacturer's recommendations and tested for efficient operation at least once in each calendar year. The results of said inspection, maintenance, and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near the unit. The burner is also subject to the particulate matter emission limitations specified in 310 CMR 7.02(8)(h).

In addition to being subject to the BACT requirements of 310 CMR 7.02(8)(a)2., Coater #20 is subject to the visible emission requirements of 310 CMR 7.06, the dust, odor, construction and demolition requirements of 310 CMR 7.09 and the noise reduction requirements of 310 CMR 7.10. There are no New Source Performance Standards (40 CFR Part 60) or National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63) which apply to this source.

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
3	Ishikawajima-Harima Heavy Industries, Model #1031-334 paper coater with 15 dryer sections and 14 propane-fired burners	2,873 feet of paper per minute 13 burners - 1.5MMBtu/hr each 1 burner - 3.5 MMBtu/hr	None

Table 1 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
3	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the coatings applied to EU #3 shall not exceed a VOC content of 0.580 percent by weight as-applied.	VOC	≤ 2.68 tons per calendar month and ≤ 32.2 tons in any 12 consecutive month period
	2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the coatings applied to EU #3 shall not exceed a VOC content 1.35 pounds per gallon of solids as applied.		
	3. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the coatings applied to EU #3 shall not exceed a total HAP content of 0.294 percent by weight as-applied.	Total HAP	≤ 0.82 tons per calendar month and ≤ 9.83 tons in any 12 consecutive month period
	4. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., no more than a combined total of 5,000,000 pounds of coatings identified as FTL-B8 and OC-R5 shall be applied to EU #3 in any 12 consecutive month period. Coatings applied to EU #3, other than FTL-B8 and OC-R5, do not have a usage restriction.	Single HAP	≤ 0.82 tons per calendar month and ≤ 9.80 tons in any 12 consecutive month period
	5. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., only water shall be used for cleanup operations on EU #3.	PM	≤ 0.10 lb of particulate matter per million Btu of heat input for each propane-fired burner with a heat input equal to or greater than 3 million Btu per hour.-310 CMR 7.02(8)(h)
		smoke	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart
		Opacity	$\leq 20\%$, except 20 to $\leq 40\%$ for ≤ 2 minutes during any one hour

Table 2 Key:

EU# = Emission Unit Number

PM = Total Particulate Matter

VOC = Volatile Organic Compounds

Single HAP = maximum single Hazardous Air Pollutant

Total HAP = total Hazardous Air Pollutants.

Btu = British Thermal Unit

\leq = Less than or equal to

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
3	1. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	2. In accordance with 310 CMR 7.04(4)(a), the 3.5 million Btu per hour burner shall be inspected and maintained in accordance with the manufacturers recommendations and tested for efficient operation at least once in each calendar year.
	3. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13

Table 3 Key:

EU# = Emission Unit Number

Table 4	
EU#	Recordkeeping Requirements
3	1. The Permittee shall maintain daily records which shall include, but are not limited to: <ol style="list-style-type: none"> identity, quantity, formulation and density of coatings used; identity, quantity, formulation and density of any diluent(s) and clean-up solvents used; solids content of any coating(s) used; actual operational and emissions characteristics of the coating line; quantity of product processed; pounds of VOCs per gallon of coating as applied; pounds of VOCs per gallon of solids as applied; and pounds of HAPs per gallon of coating as applied.
	2. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	3. In accordance with 310 CMR 7.04(4)(a), maintain comprehensive and accurate records of the annual inspection, maintenance and testing and the date upon which it was performed. These said records shall be posted conspicuously on or near the 3.5 million Btu per hour burner.
	4. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	5. The Permittee shall maintain a copy of this Plan Approval and the underlying Application approved herein on-site.
	6. The Permittee shall maintain a record of routine maintenance activities, affecting air contaminant emission rates, performed on the approved EU(s). The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	7. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s). At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	8. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	9. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	10. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU# = Emission Unit Number
 PCD = Pollution Control Device
 SOMP = Standard Operating and Maintenance Procedure
 USEPA = United States Environmental Protection Agency
 HAPs = Hazardous Air Pollutants
 VOCs = Volatile Organic Compounds

Table 5	
EU#	Reporting Requirements
3	<ol style="list-style-type: none"> The Permittee shall submit a report to MassDEP at least every six months (January 30 and July 30 of each calendar year) for the records during the previous 6 month period which shall include: <ol style="list-style-type: none"> the actual emissions of VOCs from EU#3 for each calendar month and for each consecutive twelve month period (current month plus prior eleven months); the actual emissions of total HAPs from EU #3 for each calendar month and for each consecutive twelve month period (current month plus prior eleven months); the actual emissions of the highest single HAP from EU #3 for each calendar month and for each consecutive twelve month period (current month plus prior eleven months); the as-applied VOC content in units of percent by weight and pounds per gallon of solids applied for each coating applied on EU #3; the as-applied total HAP content in units of percent by weight for each coating applied on EU #3; and the combined amount of coating FTL-B8 and OC-R5 applied to EU #3 for each calendar month and for each consecutive twelve month period.
Facility-wide	<ol style="list-style-type: none"> The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	<ol style="list-style-type: none"> The Permittee shall notify the Western Regional Office of MassDEP, BWP Permit Chief by telephone [413-755-2115], email [marc.simpson@state.ma.us] or fax [413-784-1149], as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Permit Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	<ol style="list-style-type: none"> The Permittee shall annually report to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.
	<ol style="list-style-type: none"> The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.
	<ol style="list-style-type: none"> The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	<ol style="list-style-type: none"> The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:

EU# = Emission Unit Number

HAP = Hazardous Air Pollutant

VOC = Volatile Organic Compound

4. **SPECIAL TERMS AND CONDITIONS**

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
3	<p>1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the Permittee shall comply with the following work practices:</p> <ul style="list-style-type: none"> a. Store all VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials in closed containers; b. ensure that mixing and storage containers used for VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials; d. convey VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; e. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that: (i) equipment cleaning is performed without atomizing the cleanup solvent; and, (ii) all spent solvent is captured in closed containers; and f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.
Facility-wide	<p>2. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.</p>

Table 6 Key:

EU# = Emission Unit Number

HAP = Hazardous Air Pollutant

VOC = Volatile Organic Compound

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.” The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
3	56	3	40-42	280-375

Table 7 Key:

EU# = Emission Unit Number

°F = Degree Fahrenheit

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.

- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Cortney Danneker by telephone at 413-755-2234, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Marc Simpson
Air Quality Permit Chief
Bureau of Waste Prevention

ecc: MassDEP/Boston - Yi Tian
MassDEP/WERO – Peter Czapienski

cc: Doug Stellato
Tighe & Bond
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